

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

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2006 DEC 20 A 9:23

GEORGE HOEY MORRIS
PLAINTIFF

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

VS

2:06 - CV - 1005 - MEF

HOMELAND SECURITY ET AL

OBJECTION TO TROY KING AND
MATTHEW BEAM'S MOTION TO DISMISS

COMES NOW THE DEFENDANT GEORGE HOEY MORRIS APPERING
PRO SE AND WITHOUT THE BENEFIT OF A LAW LIBRARY
OR ANY OTHER LEGAL INFORMATION AND FILES THIS
OBJECTION IN THE ABOVE STYLED CASE.

BACKGROUND

1) DEFENDANTS TROY KING AND MATTHEW BEAM ARE PLAINTIFF'S
ADVERSARIES IN TWO CIVIL RIGHTS CASES.

THEY REPRESENTED EUGENIA LOGGINS AFTER SHE (DEPUTIES)
OPENED SEALED CARTONS OF PRINTED MEDIA WITAHOUT A
WARRANT, SEIZED THAT PUBLISHED MATERIAL AND REFUSED TO
RETURN SAID MEDIA.

2) PLAINTIFF FILED A SECOND COMPLAINT AFTER OFFICER
DANIEL DEAN SEARCHED HIS VEHICLE OVER HIS OBJECTIONS

AND WITHOUT A WARRANT. A CAMERA RECORDED THE EVENT DURING WHICH PLAINTIFF EXPLAINED THAT THE CONSTITUTION PROHIBITED THIS TYPE OF INTRUSION BY THE STATE WITHOUT A WARRANT.

3) THE ALABAMA ATTORNEY GENERAL (AAG) BECAME ACTIVELY INVOLVED IN SEEKING A CRIMINAL CONVICTION OF MORRIS ONLY TEN DAYS AFTER HONORABLE MARK FULLER RULED THAT EUGENIA LOGGINS ENJOYED QUALIFIED IMMUNITY. THE AAG EXECUTED THE WARRANTS ON MORRIS' RESIDENCES SEEKING CHILD PORNOGRAPHY; EACH OF WHICH UNCOVERED NO ILLEGAL PHOTOGRAPHY.

4) ALAN NUMMY, WHO IS MAYOR OF ECLECTIC AND AN EMPLOYEE OF TROY KING USED HIS AUTHORITY OVER THE EPD TO ACTIVELY PURSUE A CONVICTION OF MORRIS FOR A CRIME; ANY CRIME. THIS EFFORT CAUSED HIM TO VIOLATE THE LAW ON NUMEROUS OCCASIONS; ALL OF WHICH ARE DOCUMENTED IN THE CIVIL COMPLAINT.

5) THE FIRST INDICATION THAT TROY KING EMPLOYEE ALAN NUMMY WAS PERSONALLY INVOLVED BECAME APPARENT AFTER OFFICER DANIEL DEAN STOPPED MORRIS FOR SPEEDING AND THE ENTIRE EPD ARRIVED AT THE SCENE.

ALAN NUMMY; DESPITE THE FACT HE HAD NO REASON TO BE THERE, SUPERVISED THAT SEARCH OF THE VEHICLE.

6) IT IS THE ASSERTION OF THE UNDERSIGNED THAT ALAN NUMMY'S ACTIVE INVOLVEMENT IN ALL OF THE EFFORTS TO INCARCERATE MORRIS (LEGAL AND ILLEGAL) WERE A DIRECT RESULT OF HIS CONNECTION WITH

THE AAG AND THAT HE ACTED BY PROXY IN THE INTERESTS OF THAT OFFICE.

CLAIMS FOR WHICH RELIEF MAY BE GRANTED

- 7) ON 27 JANUARY 2005, MORRIS WAS ARRESTED IN TEXAS ON THE PREMISE THAT THERE WAS A WARRANT FOR HIS ARREST WHEN IN FACT THERE WAS NOT. HE DROVE TO ALABAMA TO DISCOVER THAT HE WAS NOT WANTED. THREE HOURS LATER AN AAG WARRANT CHARGED MORRIS WITH "FORGERY" FOR SIGNING HIS OWN NAME YEARS EARLIER.
- 8) THE AAG WARRANT MUST BE INSPECTED TO DETERMINE HOW IT CAME INTO EXISTENCE AND TO DISCOVER THE FACTS SURROUNDING THAT TEXAS ARREST.
- 9) ON THE WAY TO THAT FORGERY HEARING MORRIS WAS ARRESTED WITHOUT A WARRANT UNDER THE AUTHORITY OF AAG EMPLOYEE ALAN NUMMY. MORRIS WAS PREVENTED FROM ATTENDING THE HEARING AT WHICH HE COULD DISCOVER WHY HE WAS ARRESTED FOR SIGNING "GEORGE HOEY MORRIS."
- 10) MORRIS WAS ARRESTED AFTER HE LEFT HIS ATTORNEY'S OFFICE AFTER NUMMY ET AL MISTAKENLY THOUGHT HE WAS VIOLATING HIS PRE-TRIAL PROBATION. AN AAG WARRANT ACCUSED MORRIS OF "GIVING A FALSE NAME TO A POLICE OFFICER"; THE RESULT OF MORRIS SIGNING HIS OWN NAME ON THE SPEEDING TICKET

ISSUED BY DANIEL DEAN MANY MONTHS BEFORE. THAT CHARGE (FALSE NAME) MYSTERIOUSLY DISSAPPERED FROM THE DOCKET; EVIDENCE OF MALICIOUS PROSECUTION AND INVOLUEMENT OFF THE AAG. THAT WARRANT MUST BE EXAMINED TO DETERMINE THE FACTS SURROUNDING THAT ILLEGAL ARREST BY THE AAG.

1) MANY INCIDENTS OF AN ILLEGAL AND UNCONSTITUTIONAL NATURE INVOLVING ALAN NUMMY, THE EPD AND BY PROXY THE AAG ARE DOCUMENTED IN THE COMPLAINT. TROY KING AND MATTHEW BEAM MUST EXPLAIN THEIR INVOLUEMENT IN ALL OF THE INCIDENTS.

2) THE TWO AAG ARREST WARRANTS ARE VERY SUSPICIOUS (SMOKING GUN) AND MUST BE EXAMINED FOR EVIDENCE OF ILLEGAL ACTIVITY. ALL OF THE WARRANTLESS SEARCHES AND HARRASSMENT INVOLVING THE EPD ARE CONNECTED BY PROXY TO THE AAG.

3) TROY KING AND MATTHEW BEAM MUST EXPLAIN THEIR CONNECTION WITH ALAN NUMMY AND HIS BEHAVIOR TOWARD THIS PLAINTIFF.

WHEREFORE, THE ABOVE PREMISES CONSIDERED,
DEFENDANT GEORGE HOEY MORRIS RESPECTFULLY
REQUESTS THAT HONORABLE MARK FULLER NOT DISMISS
TROY KING AND MATTHEW BEAM AS DEFENDANTS
IN THIS CASE.

RESPECTFULLY SUBMITTED ON 19 Dec 06

BY: 

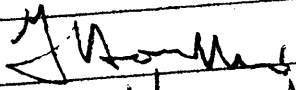
GEORGE HOEY MORRIS
FEDERAL DETENTION ANNEK
PO, Box 159
MONTGOMERY, AL 36101

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON THIS 19 DAY OF DECEMBER
2006 I HAVE SERVED A COPY OF THIS OBJECTION
BY PLACING SAME IN THE U.S. MAIL POSTAGE
PREPAID AND ADDRESSED AS FOLLOWS:

BENJAMIN H. ALBRITTON
ALABAMA STATE HOUSE
11 SOUTH UNION ST
MONTGOMERY, AL 36130-0152

ALAN NUMMY
CITY HALL
ECLECTIC, AL 36024


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